

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Stanley Linder, #137337,)	C/A No.: 1:16-754-RMG-SVH
)	
Plaintiff,)	
)	AFFIDAVIT OF DEFENDANT
v.)	ANGELIA BROWN
)	
Maverick Wilson; Angelena Brown;)	
Tonya James; and Mr. Sgt. Thomas,)	
)	
Defendants.)	

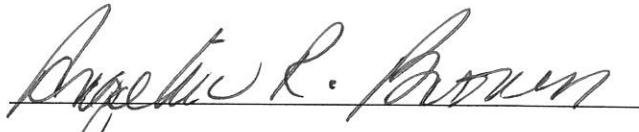
**PERSONALLY APPEARED BEFORE ME, the undersigned, Angelia Brown, who, being
first duly sworn does depose and say;**

1. I am employed by the State of South Carolina and the South Carolina Department of Corrections ("SCDC"), an agency of the State of South Carolina. I hold the position of Disciplinary Hearing Officer Coordinator for the South Carolina Department of Corrections. I have held this position since 2004. I held the position of DHO Coordinator at all times relevant to this action.
2. I have reviewed the Plaintiff's Complaint in the above-captioned matter, and while I am familiar with the Plaintiff, I am unable to determine what specific allegations inmate Stanley Linder (SCDC #137337), has made against me other than the assertion that I am liable for his alleged damages.
3. It is my understanding that an incident occurred on or about October 13, 2015, in which inmate Stanley Linder (SCDC 137337) alleges that Defendant Wilson tampered with his legal mail by opening and placing contraband inside the Plaintiff's mail.

4. Plaintiff's Complaint appears to assert that I improperly found him guilty of offense 855-smuggling contraband and conspiracy to smuggle contraband into a correctional institution, which he was charged with on October 13, 2015.
5. At all times mentioned in the Complaint, I acted within the scope of my employment as an employee of the State of South Carolina and the SCDC and within the rules, regulations, laws, and policies of the SCDC.
6. Specifically, as a Disciplinary Hearing Officer, I was assigned to review the Plaintiff's contraband charged from October 13, 2015.
7. On October 30, 2015, a disciplinary hearing was convened for Plaintiff's contraband charge, in which I served as the hearing officer.
8. During the hearing, the Plaintiff was given an opportunity to present evidence and witnesses to dispute the contraband charges.
9. After weighing the evidence, the Plaintiff was found guilty of Offense 855- Smuggling and/or Conspiracy to Smuggle in Contraband to a Correctional Facility, based upon the evidence that tobacco paper was found located inside the Plaintiff's legal mail.
10. At no time did I violate any of inmate Stanley Linder's (SCDC 137337), constitutional rights.
11. Rather, at all times mentioned in the Complaint, I exercised the discretion necessary to carry out my duties as an employee of SCDC and as a DHO Coordinator.
12. I followed all SCDC policies and procedures, as well as all state and federal laws and regulations in my actions that may have involved inmate Stanley Linder (SCDC #137337).

other employees or officers, or any of my co-Defendants in this action, at any time relevant to this matter.

FURTHER AFFIANT SAYETH NOT.

A handwritten signature in cursive script, reading "Angelia R. Brown", written over a horizontal line.

DHO Coordinator Angelia Brown

SWORN TO BEFORE ME THIS 21

DAY OF July, 2016.

A handwritten signature in cursive script, likely reading "Kathy S. [unclear]", written over a horizontal line.

NOTARY PUBLIC FOR

SOUTH CAROLINA

COMMISSION EXPIRES: 11/8/2021